

**Eamon McMahon**, OSB No. 153879  
Assistant County Counsel II  
eamon\_mcmahon@washingtoncountyor.gov  
Office of Washington County Counsel  
155 N First Avenue, Suite 250, MS 24  
Hillsboro, OR 97124  
Phone (503) 846-8747  
Fax (503) 846-8636  
Attorney for Amicus Washington County

UNITED STATES DISTRICT COURT  
DISTRICT OF OREGON  
PORTLAND DIVISION

DISABILITY RIGHTS OREGON,  
METROPOLITAN PUBLIC DEFENDER  
SERVICES, INC., and A.J. MADISON,

3:02-cv-00339-AN (Lead)  
3:21-cv-01637-AN (Member)  
6:22-cv-01460-AN (Member)

Plaintiffs,

v.

**DECLARATION OF CHANCE WOOLEY**

SEJAL HATHI, in her official capacity as  
Director of Oregon Health Authority; and  
SARA WALKER, in her official capacity as  
Interim Superintendent of the Oregon State  
Hospital,

Defendants.

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JAROD BOWMAN, and JOSHAWN  
DOUGLAS-SIMPSON,

Plaintiffs,

v.

SARA WALKER, Interim Superintendent of  
the Oregon State Hospital, in her official  
capacity; DOLORES MATTEUCCI, in her  
individual capacity; SAJEL HATHI, Director of  
the Oregon Health Authority, in her official  
capacity; and PATRICK ALLEN, in his  
individual capacity,

Defendants.

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LEGACY EMANUEL HOSPITAL &  
HEALTH CENTER d/b/a UNITY CENTER  
FOR BEHAVIORAL HEALTH; LEGACY  
HEALTH SYSTEM; PEACEHEALTH;  
PROVIDENCE HEALTH & SERVICES –  
OREGON; and ST. CHARLES HEALTH  
SYSTEM,

Plaintiffs,

v.

SEJAL HATHI, MD, in her official capacity as  
Director of Oregon Health Authority,

Defendant.

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I, the undersigned Chance Wooley, declare that:

1. I am a Forensic Mental Health Supervisor with Washinton County Health and Human Services. I have served in this position for 13 years and have been employed with Washington County for 26 years. I have personal knowledge of the information contained in this declaration and am competent to testify in a court of law.

2. I have reviewed the Motion for Contempt and Remedial Order filed by Plaintiff Disability Rights Oregon (DRO) on January 7, 2025.

3. In that motion, DRO requests that this Court exercise its contempt powers to compel the State to transfer or discharge all aid and assist patients on the Ready to Place list within 30 days. (Request 4(b) on p. 25).

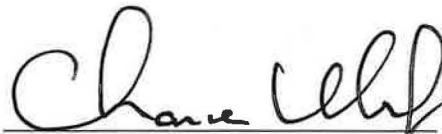
4. In my professional opinion, this remedy would pose a significant risk to the health and safety of patients with complex care and safety needs, specifically patients awaiting placement in Oregon Health Authority (OHA) certified licensed residential programs, including Secure Residential Treatment Facilities (SRTFs), Residential Treatment Facilities (RTFs), Residential Treatment Homes (RTHs), and Adult Foster Homes (AFHs), and patients who are unable or unwilling to consent to such necessary services.

5. If this Court were to impose the relief requested in 4(b) of DRO's motion, the immediate and indiscriminate transfer or discharge of these patients would likely result in increased strain on hospital emergency departments, heightened law enforcement involvement, elevated rates of recidivism, and substantial risk to patient and community safety.

6. If this Court does decide to find the State in contempt and addresses the status of individuals on the Ready to Place list, we would recommend that the state facilitate a transfer to an Oregon Health Authority-designated licensed residential facility that aligns with the patient's specific and clinical and safety needs within 30 days for those patients that require intensive, 24/7 care and/or those individuals that pose a substantial safety risk. It is my opinion that this approach would ensure continuity of restoration services within the most clinically appropriate and safe environment.

**I HEREBY DECLARE THAT THE ABOVE STATEMENT IS TRUE TO THE BEST OF MY KNOWLEDGE AND BELIEF, AND THAT I UNDERSTAND IT IS MADE FOR USE AS EVIDENCE IN COURT AND IS SUBJECT TO PENALTY FOR PERJURY.**

DATED: March 11, 2025.



Chance Wooley  
Forensic Mental Health Supervisor  
Washington County Health and Human Services

State of OREGON

County of Washington

This record was acknowledged before me on (date) March 11<sup>th</sup>, 2025 by

(name(s)) of individual(s) Chance Wooley



Notary Public - State of Oregon

My commission expires 12/27/27

Official Stamp

